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DEPUTY LORENA MIRANDA, DEPUTY  
ANDREW PEARSON, DEPUTY JOSEPH  
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ATTORNEYS AT LAW

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

JARRELL RAYVON ALLEN, an  
individual,

Plaintiff,

v.

COUNTY OF RIVERSIDE, a  
California municipal entity;  
RIVERSIDE COUNTY SHERIFF'S  
DEPARTMENT, a California  
municipal entity; CORPORAL LUIS  
IBARRA, an individual; DEPUTY  
NIGEL HINSON, an individual;  
DEPUTY MATT BILTON, an  
individual; DEPUTY ANTHONY  
LEVESQUE, an individual; DEPUTY  
SHERIFF LORENA MIRANDA, an  
individual; DEPUTY ANDREW  
PEARSON, an individual; DEPUTY  
JOSEPH RODRIGUEZ, an individual;  
and DOES 1-30, inclusive,

Defendants.

Case No. 5:19-CV-00153-RGK-SHK  
*[The Hon. R. Gary Klausner,*  
*Magistrate, Shashi H. Kewalramani]*

**DECLARATION OF  
CORRECTIONAL DEPUTY  
ANDREW PEARSON IN SUPPORT  
OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT AND/OR  
SUMMARY ADJUDICATION**

Date: January 13, 2020  
Time: 9:00 am  
Ct.rm.: 850

I, ANDREW PEARSON, state and declare as follows:

1. I am a Correctional Deputy with the Riverside County Sheriff's Department ("RCSD") and I have been employed with RCSD since September 2008. I have been named as a defendant to this action. If called and sworn as a witness to testify, I am competent to testify and would testify from my own personal knowledge as to the facts set forth in this declaration, except as to those matters that are stated on information and belief.

2. This declaration is made in support of Defendants' Motion for Summary Judgment, which I am informed and believe is being filed separately on my behalf with the Court.

3. On May 26, 2018, I was working as a Correctional Deputy at the Larry D. Smith Correctional Facility, and was assigned as the Headcount Coordinator in Classification.

4. At about 12:45 p.m., a radio call was broadcasted requesting additional deputies to Housing Unit 17 regarding a staff involved use of force.

5. When I arrived to Housing Unit 17, I saw multiple deputies trying to gain control of an inmate, later identified as Jarrell Allen, on the ground. Allen was lying face down with his left arm under his body. Allen's right arm was free from his body and was secured with a handcuff. Deputy Miranda was trying to get Allen's left arm free from his body. This is a potential safety issue due to the possibility of Allen concealing a weapon, and has the ability to push off the ground.

6. I was able to muscle Allen's arm free by pulling his left arm. I assisted with gaining control of Allen's left arm with Deputy Miranda and placed Allen's hand into the handcuff.

7. At no time during the incident did I hit, punch, or kick Allen.

8. Inmate Allen was assisted to his feet by Correctional Deputy ("CD") Hinson and CD Levesque, who escorted Allen to Intake.

I declare under penalty of perjury under the laws of the State of California and of the United States of America that the foregoing is true and correct.

Executed on December \_\_, 2019, at Riverside, California.

  
CORRECTIONAL DEPUTY ANDREW  
PEARSON